

1 McGREGOR W. SCOTT  
United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700

5 Attorneys for the United States  
6  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$827.04 SEIZED FROM  
PAYPAL ACCOUNT ASSIGNED TO EMAIL  
15 GABRIELALVA92@GMAIL.COM,

16 APPROXIMATELY \$8,975.10 SEIZED FROM  
DISCOVER BANK ACCOUNT NUMBER  
17 7016627348 IN THE NAME OF GABRIEL ALVA,

18 APPROXIMATELY \$885.10 SEIZED FROM  
ALLY BANK ACCOUNT NUMBER 1069206298  
19 IN THE NAME OF CATHERINE STUCKEY,

20 APPROXIMATELY \$4,984.84 SEIZED FROM  
CITI BANK ACCOUNT NUMBER 42011053883  
21 IN THE NAME OF CALIFITT, LLC,

22 APPROXIMATELY \$8,686.40 SEIZED FROM  
CITI BANK ACCOUNT NUMBER 206269441 IN  
23 THE NAME OF CALIFITT, LLC, AND

24 APPROXIMATELY \$445.98 SEIZED FROM  
WELLS FARGO BANK ACCOUNT NUMBER  
25 2018552089 IN THE NAME OF CATHERINE  
STUCKEY,  
26

27 Defendants.  
28

2:20-MC-00002-TLN-KJN

STIPULATION AND ORDER EXTENDING  
TIME FOR FILING A COMPLAINT FOR  
FORFEITURE AND/OR TO OBTAIN AN  
INDICTMENT ALLEGING FORFEITURE

1 It is hereby stipulated by and between the United States of America and potential claimant  
2 Gabriel Alva (“claimant”), by and through their respective counsel, as follows:

3 1. On or about August 6, 7, 9, and 12, 2019, the Homeland Security Investigation (“HSI”)  
4 seized the above-referenced defendant funds pursuant to Federal seizure warrants (hereafter collectively  
5 “defendant funds”)<sup>1</sup>.

6 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to  
7 send notice to potential claimants, file a complaint for forfeiture against the defendant funds, or obtain an  
8 indictment alleging that the defendant funds are subject to forfeiture within one hundred and fifty days of  
9 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That  
10 deadline was January 3, 2020.

11 3. By Stipulation and Order filed January 6, 2020, the parties stipulated to extend to March  
12 3, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
13 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

14 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
15 to June 1, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
16 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
17 forfeiture.

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

---

27 <sup>1</sup> The United States has decided not to file against the Approximately \$885.10 seized from Ally Bank Account Number  
28 1069206298 in the name of Catherine Stuckey and Approximately \$445.98 seized from Wells Fargo Bank Account Number  
2018552089 in the name of Catherine Stuckey identified in the caption.

1           5.       Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
3 alleging that the defendant funds are subject to forfeiture shall be extended to June 1, 2020.

4 Dated: 3/2/2020

McGREGOR W. SCOTT  
United States Attorney

5  
6 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

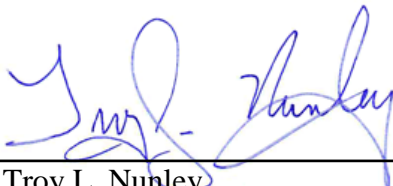
7  
8 Dated: 3/2/2020

/s/ Stephen Kahn  
STEPHEN KAHN  
Attorney for potential claimant  
Gabriel Alva

9  
10 (Signature authorized by phone)

11  
12  
13 **IT IS SO ORDERED.**

14 Dated: March 2, 2020

15   
Troy L. Nunley  
United States District Judge